



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 4, 2010

4SD-FFB

Mr. Mark E. Summers
Acting Chief, Environmental Management Branch
78 CEG/CEAN
775 Macon Street, Bldg 1555
Robins Air Force Base, Georgia 31098-2201

SUBJ: Draft Final 2009 Annual Operations and Maintenance Report for National Priorities List (NPL) Site Landfill No. 4 at Robins Air Force Base, GA

Dear Mr. Summers:

The U.S. Environmental Protection Agency, Region 4, (EPA) has reviewed the above referenced report and our comments/questions regarding the report are enclosure. Please provide a response to the comments within thirty (30) days of receipt of this letter.

If you have any questions regarding this matter, please contact me at (404) 562-8499 or hazen.hugh@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Hugh Hazen".

Hugh Hazen, RPM
KY/TN Oversight Section
Federal Facilities Branch
Superfund Division

Enclosure

cc: Mary Brown, GEPD



10450316

Technical Review Comment on the Draft Final 2009 Annual Operations and Maintenance Report for National Priorities List (NPL) Site Landfill No. 4 at Robins Air Force Base, GA

1. **Section 2.1, Page 2-2, first paragraph and Figure No.2** – Indicate that gas samples from the vent pipes were taken from sampling ports located near the top of the vent pipes as shown in Figure No. 2. However the photographs of vent pipe LF4GV1 provided in the appendices with each quarterly O & M report does not show a sampling port like the one shown in Figure No. 2. Please explain where the gas sample was taken at vent pipe LF4GV1 and provide a list of any other vent pipes that do not have a sampling port.
2. **Section 2.1, Page 2-2, first paragraph** – This paragraph indicates that gas samples were also collected approximately 6 inches above the ground surface for the ground readings. Were the ground readings taken above the concrete pad surrounding each vent pipe or above the bare ground surrounding the concrete pad, and if taken outside the concrete pad, approximately how far away from the pad were readings taken?
3. **Section 2.1, Page 2-2, first paragraph** – The portable gas sampler/analyzer used to take gas readings is mentioned in this paragraph but there is no mention of the procedures and frequency for calibrating the instrument. Please provide a narrative description of how the instrument is calibrated, the frequency of calibrations and any records for the calibrations that occurred prior to the quarterly sampling events in 2009.
4. **Section 2.1, Page 2-2, first paragraph** – This paragraph also describes where samples are taken but does not describe the procedure/methodology used for taking the samples. Please provide a more detailed description of the procedures/methodology used for taking the gas samples. Is an ATSM, EPA Reference Method or some other published methodology used in taking the gas samples?